

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

**ANTOINE LAND, ALFY STIGLER and
CHARLES JOHNSON, Individually, and
on Behalf of All Others Similarly Situated,**

Plaintiff,

v.

**SHORELINE MANAGEMENT &
DEVELOPMENT, CORP., SAUNDRA
HANSBROUGH, COMCAST
CORPORATION and COMCAST CABLE
COMMUNICATIONS MANAGEMENT,
LLC**

Defendants.

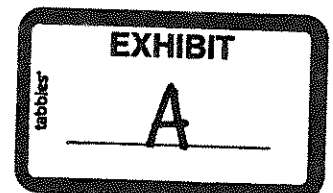
Case No. 1:11-CV-00072

(JURY TRIAL DEMANDED)

DECLARATION OF RYAN F. STEPHAN

Ryan F. Stephan hereby declares:

1. I am a principal of the law firm of Stephan Zouras, LLP ("SZ"). I submit this declaration in support of Plaintiff's petition for an award of attorneys' fees earned and expenses incurred in connection with services rendered in the above-captioned litigation.
2. I have spent the majority of my professional time in the field of labor relations and, whenever necessary, litigation of those disputes.
3. I started SZ with my law partner James B. Zouras in 2007 and have practiced there for the past five years.
4. I have tried labor and employment cases to verdict, including a \$9,000,000 verdict obtained on behalf of a class of workers in the United States District Court for the Eastern District of New York.

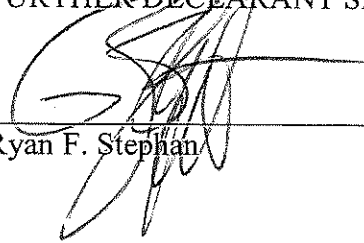


5. Since SZ was first contacted about this matter in October, 2010 its principals and professionals have conducted client intakes, investigated Plaintiff's claims, drafted pleadings, responded to motions, conducted written discovery, reviewed compensation and other records, taken and defended nine depositions, successfully moved for class certification, attended settlement conferences, worked with opposing counsel to successfully move for preliminary approval of class settlement, amongst other things.
6. The hourly rates for SZ principals (\$450-\$500/hour) and professional support staff (\$125/hour) have been accepted and approved in other contingent litigation and are comparable to rates charged by Plaintiff's counsel in similar cases in Illinois. SZ actively prosecutes dozens of individual, class and collective actions and working on this litigation has prevented SZ from prosecuting other cases.
7. I have checked the rates of various firms in Chicago who perform labor work and find that they charge between \$250.00 and \$700.00 per hour for attorneys, depending upon the firm and the particulars of the individual attorney performing the work. The market rate for paralegals in the Chicago market is over \$125.00 per hour.
8. SZ has reduced its lodestar by eliminating time entries which were arguably duplicative or unnecessary. The total number of hours expended on this litigation by SZ is over 129. SZ's total lodestar is over \$50,000.
9. SZ's lodestar figures are based upon the firm's current billing rates, which rates do not include charges for expense items. Expense items are billed separately and such charges are not duplicated in SZ's billing rates.
10. SZ incurred \$809.72 in outstanding expenses in connection with the prosecution of this litigation.

10. The expenses incurred in this action are reflected on SZ's books and records. These books and records are prepared from expense vouchers, check records and other source materials and represent an accurate recordation of the expenses incurred. The expenses incurred are expenses normally charged to clients and were reasonable and necessary to prosecute the case. They are normal costs charged to clients and not part of SZ's overhead.

11. I have not received any money from Plaintiff for my legal fees or costs.

FURTHER-DECLARANT SAYETH NOT.



Ryan F. Stephan